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IN THE UNITED STATES DISTRICT COURT
 FOR THE
 NORTHERN MARIANA ISLANDS

LI YING HUA, LI ZHENG ZHE and XU JING JI, Plaintiffs, vs. JUNG JIN CORPORATION, a CNMI corporation, ASIA ENTERPRISES, INC., a CNMI corporation, PARK HWA SUN and KIM HANG KWON, Defendants.) CASE NO. CV 05-0019)) EX PARTE MOTION UNDER LOCAL) RULES 7.1.h.3(b) AND 7.1.h.5 FOR AN) ORDER SHORTENING TIME FOR) CONSIDERATION OF PLAINTIFFS') APPLICATION FOR A) THIRD ORDER IN AID OF) JUDGMENT)) Date: none requested) Time: none requested) Judge: Hon. Alex R. Munson, Chief Judge
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Plaintiffs, by and through their undersigned attorney of record, hereby file this Motion to Shorten Time, *ex parte*, pursuant to Fed R. Civ. P. 6(d) and Local Rule 7.1.h.5 for consideration of the Application of Plaintiffs for a Third Order in Aid of Judgment pursuant to Fed. R. Civ. P. 69(a) and Title 7, Sections 4205 of the Commonwealth Code (2000).

CERTIFICATE PURSUANT TO LOCAL RULE 7.1.H.3(b)

1. I am the attorney for Plaintiffs in the above-captioned case. I submit this certificate pursuant to Local Rules 7.1.h.3(b) in support of Plaintiffs' *ex parte* motion for an order shortening time for considering Plaintiffs' Application for a Third Order in Aid of Judgment. In support of this motion, Plaintiffs submit this Certificate of the undersigned.

2. This matter was scheduled for hearing on April 12, 2007 to determine the status of certain liens on property of Defendants seized by the United States Marshal pursuant to prior orders in aid of judgment in this matter.

3. On March 15, 2007, third-party lienholder Pil Sun Kim Kitami filed with the Court a Relinquishment of Security Interests.

4. There is no further issue of liens or encumbrances with regard to the remaining assets of Defendants seized by the United States Marshal.

5. There is no further need for a hearing to determine whether Defendants' leasehold interest in Lot 056 H14 located in Susupe, Saipan, Commonwealth of the Northern Mariana Islands, can be sold free and clear of all liens and encumbrances.

6. There is no further need for a hearing to determine whether the 2005 Toyota Tacoma, License Plate No. ACF873, VIN# 5TENX22N35Z025455 and the 2003 Kia Sorento, License Plate No. ABR529, VIN# KNDJC733235161240 can be sold free and clear of all liens and encumbrances.

7. Time is of the utmost essence.

8. Defendants are proceeding *pro se* since the withdrawal of their attorney prior to the judgment in this matter. Their last know contact information is as follows:

Jung Jin Corporation
P.O. Box 503428
Saipan, MP 96950
(670) 235-4321

Park Hwa Sun
P.O. Box 503428
Saipan, MP 96950
(670) 235-4321

Asia Enterprises Inc.
P.O. Box 503448
Saipan, MP 96950
(670) 235-4321

Kim Hang Kwon
P.O. Box 503448
Saipan, MP 96950
(670) 235-4321

9. The above-listed defendants have received notice by certified mail of all prior filings in these post-judgment proceedings, and will receive a copy of this motion and the application for a third order in aid of judgment by certified mail, return receipt requested to the above-listed addresses.

1 10. Third-Party Pil Sun Kim Kitami will receive notice of this motion and the application for
2 a third order in aid of judgment through her attorney, Richard W. Pierce, via the Court's Electronic
3 Case Filing system.

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5 WHEREFORE, for the foregoing reasons, Plaintiffs waive any hearing on their application
6 and this motion and respectfully request that the Court grant Plaintiffs' Application for a Third
7 Order in Aid of Judgment as soon hereafter as the Court will allow.

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9 Respectfully submitted this 27th day of March, 2006.

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11 /s/ Mark B. Hanson

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